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June 12, 2015

VIA ECF

The Honorable Lorna G. Schofield
U.S. District Court, Southern District of New York
40 Foley Square
New York, NY 10007

Re: HLP Props., LLC, et al v. Consol. Edison Co. of N.Y., No. 14-CV-1383 (LGS)

Dear Judge Schofield:

In accordance with the Court's June 2, 2015 order (Dkt. 275), the parties in the above-referenced action submit this joint letter to report that they have reached an agreement on "a proposed expert discovery schedule, including deadlines for reports, production of underlying documents, depositions, and final completion of expert discovery," as follows:

1. Following completion of Plaintiffs' remaining productions relating to the privilege re-review process on June 30, a period of 35 days will be provided for Con Edison to complete its review of Plaintiffs' recent productions, from Wednesday, July 1 to Wednesday, August 5.
2. Each party's initial expert reports (i.e., reports directed to issues upon which that party bears the burden of proof) shall be filed within 15 days after the conclusion of Con Edison's review period, i.e., on or before Thursday, August 20. Supporting materials will be served within 4 days after service of reports (i.e., by Monday, August 24).
3. Rebuttal reports shall be filed within 25 days after the deadline for service of expert reports, i.e., on or before Monday, September 14. Supporting materials will be served within 3 days after service of reports (i.e., by Thursday, September 17).
4. All expert depositions shall be completed within 24 days after the deadline for service of rebuttal reports, i.e., by Thursday, October 8.

The parties respectfully request that the Court so-order this proposed schedule.

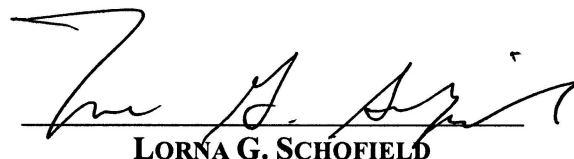
Respectfully submitted,

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Application GRANTED. Any of the deadlines in paragraphs 2 and 3 above may be altered by the written consent of all parties without application to the Court, provided that all expert discovery is completed by October 8, 2015.

Dated: June 15, 2015
New York, New York



LORNA G. SCHOFIELD

UNITED STATES DISTRICT JUDGE

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